

ELH18CV3862**December 11, 2018 US District Court 101 W Lombard St, Baltimore, MD 21201**

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Benjamin Vient
 217 West 18th St. #238
 New York, NY 10011
 Plaintiff

DEC 20 2018
 AT LAW CLERK'S
 U.S. DISTRICT COURT
 DISTRICT OF MARYLAND
 BY DEPUTY

Complaint against:

APG Media

Defendant

C/o Attorney: Richard A. DeTar

100 N. West Street

Easton, Maryland 21601

Complaint:

This is an action for clear intellectual property and copyright infringement under the Copyright Act of 1976 (the "Copyright Act"), 17 U.S.C. §§ 101 *et seq.* Defendant has willfully infringed upon Plaintiff's copyright and intellectual property rights, including the rights to reproduce, the rights to distribute copies and the rights to display copies of Plaintiff's works. Please see Exhibit. Editor wrote that this usage "begun" around 2/23/18.

N.B. The extent and timeline of infringement is information only the Defendant knows at this time, thus necessitating the Motion for Discovery, in order to produce a factual list of infringements of works, and appropriate damages and relief, in accordance with the Copyright Act of 1976 (the "Copyright Act"), 17 U.S.C. §§ 101 *et seq.*

Relief:

Plaintiff seeks relief of all remedies as accorded under the law, including an independent accounting of usage of works, damages and statutory damages as available under the Copyright Act of 1976 (the "Copyright Act"), 17 U.S.C. §§ 101 *et seq.*, Plaintiff's legal fees and costs, preliminary and permanent injunctive relief, other damages and relief related to the infringement of Plaintiff's intellectual property, and further legal and equitable relief as the Court deems just and proper.

Signed, Benjamin Vient December 11, 2018

